

BILL LOCKYER, Attorney General  
of the State of California  
JANA L. TUTON, State Bar No. 78206  
Deputy Attorney General  
California Department of Justice  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Telephone: (916) 324-5342  
Facsimile: (916) 327-8643

Attorneys for Complainant

**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SHANA G. SHRIVER  
54 Terrace Drive  
Chico, CA 95926

Pharmacy License No. TCH 24111

Respondent.

Case No. 2921

**DEFAULT DECISION  
AND ORDER**

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about December 16, 2005, Complainant Patricia F. Harris, in her official capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs, filed Accusation No. 2921 against Shana G. Shriver (Respondent) before the Board of Pharmacy.

2. On or about October 22, 1997, the Board of Pharmacy (Board) issued Pharmacy License No. TCH 24111 to Respondent. The Pharmacy License was in full force and effect at all times relevant to the charges brought herein and will expire on November 30, 2005, unless renewed.

3. On or about January 3, 2006, Carol Sekara, an employee of the Department of Justice, served by Certified and First Class Mail a copy of the Accusation No. 2921, Statement to Respondent, Notice of Defense, Request for Discovery, and Government

1 Code sections 11507.5, 11507.6, and 11507.7 to Respondent's address of record with the Board,  
2 which was and is 54 Terrace Drive, Chico, CA 95926. A copy of the Accusation, the related  
3 documents, and Declaration of Service are attached as exhibit A, and are incorporated herein by  
4 reference.

5 4. Service of the Accusation was effective as a matter of law under the  
6 provisions of Government Code section 11505, subdivision (c).

7 5. Government Code section 11506 states, in pertinent part:

8 "(c) The respondent shall be entitled to a hearing on the merits if the respondent  
9 files a notice of defense, and the notice shall be deemed a specific denial of all parts of the  
10 accusation not expressly admitted. Failure to file a notice of defense shall constitute a waiver of  
11 respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing."

12 6. Respondent failed to file a Notice of Defense within 15 days after service  
13 upon her of the Accusation, and therefore waived her right to a hearing on the merits of  
14 Accusation No. 2921.

15 7. California Government Code section 11520 states, in pertinent part:

16 "(a) If the respondent either fails to file a notice of defense or to appear at the  
17 hearing, the agency may take action based upon the respondent's express admissions or upon  
18 other evidence and affidavits may be used as evidence without any notice to respondent."

19 8. Pursuant to its authority under Government Code section 11520, the Board  
20 finds Respondent is in default. The Board will take action without further hearing and, based on  
21 Respondent's express admissions by way of default and the evidence before it, contained in  
22 exhibits A and B finds that the allegations in Accusation No. 2921 are true.

### 23 DETERMINATION OF ISSUES

24 1. Based on the foregoing findings of fact, Respondent Shana G. Shriver has  
25 subjected her Pharmacy License No. TCH 24111 to discipline.

26 2. A copy of the Accusation and the related documents and Declaration of  
27 Service are attached.

28 3. The agency has jurisdiction to adjudicate this case by default.

- a. Business and Professions Code section 4301(f) (Dishonest Acts).
- b. Business and Professions Code section 4301(j) (Violation of Drug Laws).

IT IS SO ORDERED that Pharmacy Technician Registration No. TCH 24111, heretofore issued to Respondent Shana G. Shriver, is revoked.

This Decision shall become effective on April 28, 2006.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

STANLEY W. GOLDENBERG  
Board President

Exhibit A: Accusation No. 2921, Related Documents, and Declaration of Service  
Exhibit B: Postal Return Documents

Exhibit A

Accusation No. 2921  
Related Documents and Declaration of Service

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of the State of California  
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Attorneys for Complainant

**BEFORE THE  
BOARD OF PHARMACY  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 2921

SHANA G. SHRIVER  
54 Terrace Drive  
Chico, CA 95926

**A C C U S A T I O N**

Pharmacy License No. TCH 24111

Respondent.

Complainant alleges:

**PARTIES**

1. Patricia F. Harris (Complainant) brings this Accusation solely in her official capacity as the Executive Director of the Board of Pharmacy.

2. On or about October 22, 1997, the Board of Pharmacy issued Pharmacy License Number TCH 24111 to Shana G. Shriver (Respondent). The Pharmacy License was in full force and effect at all times relevant to the charges brought herein and will expire on November 30, 2005, unless renewed.

**JURISDICTION**

3. This Accusation is brought before the Board of Pharmacy (Board), under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

///

1                   4.       Section 4300 of the Code states, in pertinent part:

2                   (a) Every license issued may be suspended or revoked.

3                   (b) The board shall discipline the holder of any license issued by the board,  
4                   whose default has been entered or whose case has been heard by the board and  
5                   found guilty, by any of the following methods:

6                   (1) Suspending judgment.

7                   (2) Placing him or her upon probation.

8                   (3) Suspending his or her right to practice for a period not exceeding one year.

9                   (4) Revoking his or her license.

10                  (5) Taking any other action in relation to disciplining him or her as the  
11                  board in its discretion may deem proper.

12                  \*\*\*\*\*

13                  (e) The proceedings under this article shall be conducted in accordance  
14                  with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of the  
15                  Government Code, and the board shall have all the powers granted therein. The  
16                  action shall be final, except that the propriety of the action is subject to review by  
17                  the superior court pursuant to Section 1094.5 of the Code of Civil Procedure.

18                  5.       Section 4301 of the Code states in pertinent part:

19                  The board shall take action against any holder of a license who is guilty of  
20                  unprofessional conduct or whose license has been procured by fraud or  
21                  misrepresentation or issued by mistake. Unprofessional conduct shall include, but  
22                  is not limited to, any of the following:

23                  \*\*\*\*\*

24                  (f) The commission of any act involving moral turpitude, dishonesty,  
25                  fraud, deceit, or corruption, whether the act is committed in the course of relations  
26                  as a licensee or otherwise, and whether the act is a felony or misdemeanor or not.

27                  \*\*\*\*\*

28                  (j) The violation of any of the statutes of this state or of the United States  
                  regulating controlled substances and dangerous drugs.

                  6.       Health and Safety Code section 11170 provides that no person shall  
                  prescribe, administer or furnish a controlled substance for himself.

                  7.       Health and Safety Code section 11173, subdivision (a) provides that no  
                  person shall obtain or attempt to obtain controlled substances, or procure or attempt to procure

                  ///

1 the administration of or prescription for controlled substances, (1) by fraud, deceit,  
2 misrepresentation, or subterfuge; or (2) by the concealment of a material fact.

3 8. Section 125.3 of the Code states, in pertinent part, that the Board may  
4 request the administrative law judge to direct a licensee found to have committed a violation or  
5 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
6 and enforcement of the case.

7 9. Section 4022 of the Code states:

8 "Dangerous drug" or "dangerous device" means any drug or device unsafe  
9 for self-use, except veterinary drugs that are labeled as such, and includes the  
10 following:

11 (a) Any drug that bears the legend: "Caution: federal law prohibits  
12 dispensing without prescription," "Rx only," or words of similar import.

13 (b) Any device that bears the statement: "Caution: federal law restricts this  
14 device to sale by or on the order of a \_\_\_\_\_," "Rx only," or words of similar  
15 import, the blank to be filled in with the designation of the practitioner licensed to  
16 use or order use of the device.

17 (c) Any other drug or device that by federal or state law can be lawfully  
18 dispensed only on prescription or furnished pursuant to Section 4006.

## 19 DRUGS

20 10. "Norco" is a compound consisting of Hydrocodone, a Schedule III  
21 controlled substance as designated by Health and Safety Code section 11056, subdivision (e)(4),  
22 and Acetaminophen, and a dangerous drug pursuant to section 4022 of the Code in that under  
23 federal or state law it can be lawfully dispensed only on prescription or furnished pursuant to  
24 section 4006 of the Code.

## 25 FIRST CAUSE FOR DISCIPLINE

### 26 (Dishonest Acts)

27 11. Respondent is subject to disciplinary action under section 4301(f) of the  
28 Code in that from on or about April 2003 through September 7, 2004, respondent stole  
approximately 16,000 Norco tablets from her employer, Rite Aid Pharmacy, #6087 in Chico,  
California. Respondent sold some of the tablets, and self administered the remainder.

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12. Respondent is subject to disciplinary action under section 4301(j) of the Code in that her actions, as alleged in paragraph 11 above, were in violation of Health and Safety Code sections 11170 and 11173(A).

**WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Pharmacy issue a decision:

1. Revoking or suspending Pharmacy License Number TCH 24111, issued to Shana G. Shriver;

2. Ordering Shana G. Shriver to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

3. Taking such other and further action as deemed necessary and proper.

DATED: 12/16/05

*P. F. Harris*  
 \_\_\_\_\_  
 PATRICIA F. HARRIS  
 Executive Director  
 Board of Pharmacy  
 State of California  
 Complainant



BILL LOCKYER, Attorney General  
of the State of California  
JANA L. TUTON, State Bar No. 78206  
Deputy Attorney General  
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**BEFORE THE  
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STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SHANA G. SHRIVER

Respondent.

Case No. 2921

**STATEMENT TO RESPONDENT**

[Gov. Code §§ 11504, 11505(b)]

TO RESPONDENT:

Enclosed is a copy of the Accusation that has been filed with the Board of Pharmacy of the Department of Consumer Affairs (Board), and which is hereby served on you.

Unless a written request for a hearing signed by you or on your behalf is delivered or mailed to the Board, represented by Deputy Attorney General Jana L. Tuton, within fifteen (15) days after a copy of the Accusation was personally served on you or mailed to you, you will be deemed to have waived your right to a hearing in this matter and the Board may proceed upon the Accusation without a hearing and may take action thereon as provided by law.

The request for hearing may be made by delivering or mailing one of the enclosed forms entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided in section 11506 of the Government Code, to

**Jana L. Tuton  
Deputy Attorney General  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, California 94244-2550.**

1           You may, but need not, be represented by counsel at any or all stages of these  
2 proceedings.

3           The enclosed Notice of Defense, if signed and filed with the Board, shall be  
4 deemed a specific denial of all parts of the Accusation, but you will not be permitted to raise any  
5 objection to the form of the Accusation unless you file a further Notice of Defense as provided in  
6 section 11506 of the Government Code within fifteen (15) days after service of the Accusation  
7 on you.

8           If you file any Notice of Defense within the time permitted, a hearing will be held  
9 on the charges made in the Accusation.

10          The hearing may be postponed for good cause. If you have good cause, you are  
11 obliged to notify the Office of Administrative Hearings, 560 J Street, Suite 340/360, Sacramento,  
12 California 95814, within ten (10) working days after you discover the good cause. Failure to  
13 notify the Office of Administrative Hearings within ten (10) days will deprive you of a  
14 postponement.

15          Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are  
16 enclosed.

17          If you desire the names and addresses of witnesses or an opportunity to inspect  
18 and copy the items mentioned in section 11507.6 of the Government Code in the possession,  
19 custody or control of the Board you may send a Request for Discovery to the above designated  
20 Deputy Attorney General.

21                   **NOTICE REGARDING STIPULATED SETTLEMENTS**

22          It may be possible to avoid the time, expense and uncertainties involved in an  
23 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated  
24 settlement is a binding written agreement between you and the government regarding the matters  
25 charged and the discipline to be imposed. Such a stipulation would have to be approved by the  
26 Board of Pharmacy but, once approved, it would be incorporated into a final order.

27          Any stipulation must be consistent with the Board's established disciplinary  
28 guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the

1 Board's Disciplinary Guidelines will be provided to you on your written request to the state  
2 agency bringing this action.

3 If you are interested in pursuing this alternative to a formal administrative hearing,  
4 or if you have any questions, you or your attorney should contact Deputy Attorney General Jana  
5 L. Tuton at the earliest opportunity.

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STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 2921

SHANA G. SHRIVER

**REQUEST FOR DISCOVERY**

Respondent.

[Gov. Code § 11507.6]

TO RESPONDENT:

Under section 11507.6 of the Government Code of the State of California, parties to an administrative hearing, including the Complainant, are entitled to certain information concerning the opposing party's case. A copy of the provisions of section 11507.6 of the Government Code concerning such rights is included among the papers served.

PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU  
ARE HEREBY REQUESTED TO:

1. Provide the names and addresses of witnesses to the extent known to the Respondent, including, but not limited to, those intended to be called to testify at the hearing, and
2. Provide an opportunity for the Complainant to inspect and make a copy of any of the following in the possession or custody or under control of the Respondent:
  - a. A statement of a person, other than the Respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the Respondent as to this person is the basis for the administrative proceeding;

1           b.       A statement pertaining to the subject matter of the proceeding made by any  
2 party to another party or persons;

3           c.       Statements of witnesses then proposed to be called by the Respondent and  
4 of other persons having personal knowledge of the acts, omissions or events which are the  
5 basis for the proceeding, not included in (a) or (b) above;

6           d.       All writings, including but not limited to reports of mental, physical and  
7 blood examinations and things which the Respondent now proposes to offer in evidence;

8           e.       Any other writing or thing which is relevant and which would be  
9 admissible in evidence, including but not limited to, any patient or hospital records  
10 pertaining to the persons named in the pleading;

11          f.       Investigative reports made by or on behalf of the Respondent pertaining to  
12 the subject matter of the proceeding, to the extent that these reports (1) contain the names  
13 and addresses of witnesses or of persons having personal knowledge of the acts,  
14 omissions or events which are the basis for the proceeding, or (2) reflect matters  
15 perceived by the investigator in the course of his or her investigation, or (3) contain or  
16 include by attachment any statement or writing described in (a) to (e), inclusive, or  
17 summary thereof.

18               For the purpose of this Request for Discovery, "statements" include written  
19 statements by the person, signed, or otherwise authenticated by him or her, stenographic,  
20 mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person,  
21 and written reports or summaries of these oral statements.

22               YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for  
23 Discovery should be deemed to authorize the inspection or copying of any writing or thing which  
24 is privileged from disclosure by law or otherwise made confidential or protected as attorney's  
25 work product.

26               Your response to this Request for Discovery should be directed to the undersigned  
27 attorney for the Complainant at the address on the first page of this Request for Discovery **within**  
28 **30 days after service** of the Accusation.

1 Failure without substantial justification to comply with this Request for Discovery  
2 may subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30  
3 of the Government Code.

4 DATED: 1-3-06

5 BILL LOCKYER, Attorney General  
6 of the State of California

7 

8 JANA L. TUTON  
9 Deputy Attorney General

10 Attorneys for Complainant

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**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SHANA G. SHRIVER

Respondent.

Case No. 2921

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

DATED: \_\_\_\_\_

Respondent's Name

Respondent's Signature

Respondent's Mailing Address

City, State and Zip Code

Respondent's Telephone Number

**Check appropriate box:**

- ☐ I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

City, State and Zip Code

Counsel's Telephone Number

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

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**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

SHANA G. SHRIVER

Respondent.

Case No. 2921

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[Gov. Code §§ 11505 and 11506]

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I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

DATED: \_\_\_\_\_

Respondent's Name

Respondent's Signature

Respondent's Mailing Address

City, State and Zip Code

Respondent's Telephone Number

**Check appropriate box:**

- ☐ I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

City, State and Zip Code

Counsel's Telephone Number

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

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**COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7**  
**PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505**

**SECTION 11507.5: Exclusivity of discovery provisions**

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

**SECTION 11507.6: Request for discovery**

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

## **SECTION 11507.7: Petition to compel discovery; Order; Sanctions**

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

\*\*\*\*\*

Exhibit B  
Postal Return Documents

**DECLARATION OF SERVICE BY CERTIFIED MAIL AND FIRST CLASS MAIL**  
(Separate Mailings)

Case Name: **In the Matter of the Accusation Against: Shana G. Shriver**  
Case No.: **2921**

I declare:

I am employed in the Office of the Attorney General, which California State Bar at which member's direction this service older and not a party to this matter. I am familiar with the bu Attorney General for collection and processing of correspondence States Postal Service. In accordance with that practice, corre mail collection system at the Office of the Attorney General Postal Service that same day in the ordinary course of business

On January 3, 2006, I served the attached **Accusation, State Discovery, Notice of Defense (2 copies), and Government** copy thereof enclosed in a sealed envelope as certified mail w and return receipt requested, and another true copy of the **Acc Respondent, Request for Discovery, Notice of Defense (2 c sections** was enclosed in a second sealed envelope as first cla prepaid, in the internal mail collection system at the Office Sacramento addressed as follows

Shana G. Shriver  
54 Terrace Drive  
Chico, CA 95926  
Respondent  
Certified Mail Number  
7160 3901 9848 9138 6157

I declare under penalty of perjury under the laws of the State and correct and that this declaration was executed on January

CAROL L. SEKARA  
Declarant

cc: Kim deLong, Enforcement Analyst, Bd. of Pharmacy

10212470.wpd

7160 3901 9848 9138 6157

**TO:** Shana G. Shriver  
54 Terrace Drive  
Chico, CA 95926

**SENDER:** Jana L. Tuton

**REFERENCE:** Shriver/AccusPkt

**Certified Article Number**

7160 3901 9848 9138 6157

PS Form 3811, July 2001

Domestic Return Receipt

Shana G. Shriver  
54 Terrace Drive  
Chico, CA 95926

3. Service Type **CERTIFIED MAIL**  
4. Restricted Delivery? (Extra Fee) ☐ Yes  
1. Article Addressed to: ☐ Yes

7160 3901 9848 9138 6157



A. Received by (Please Print Clearly)		B. Date of Delivery	
Shana Jackson		1-9-06	
C. Signature	<input type="checkbox"/> Agent	<input type="checkbox"/> Addressee	
D. Is delivery address different from item 1? If YES, enter delivery address below:		<input type="checkbox"/> Yes <input type="checkbox"/> No	
43 Skywalker Ct. Chico, CA 95973			

Shriver/Accus Pkt  
Jana L. Tuton, DAG